

<p>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)</p>	
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<p>In re:</p> <p>BLOCKFI INC., et al., Debtors.¹</p>	<p>Chapter 11 Case No. 22-19361 (MBK) (Jointly Administered under a Confirmed Plan²) Hearing Date: November 7, 2024 @ 11:30 AM ET</p>

**WIND-DOWN DEBTORS' WITNESS AND EXHIBIT LIST
FOR NOVEMBER 7, 2024 HEARING**

¹ The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the “Plan”) [Docket No. 1609]. Unless otherwise indicated, capitalized terms used but not defined in this Motion shall have the meanings ascribed to them in the Plan.

BlockFi Inc. and its debtor affiliates (collectively, “BlockFi” or the “Wind-Down Debtors,” or referred to in the past tense as the “Debtors”), as managed by the Plan Administrator, in the above-referenced Chapter 11 cases, hereby submit this Witness and Exhibit List for the hearing to be held on November 7, 2024 at 11:30 a.m. (prevailing Eastern Time) (the “Hearing”) on the *Wind-Down Debtors’ Motion for Entry of an Order to Show Cause Why George Gerro Should Not be Found in Contempt and for Sanctions and in the Alternative, Motion to Enforce the Confirmation Order* [Docket No. 2412] (the “Show Cause Motion”)³ as follows:

WITNESSES

The Wind-Down Debtors reserve the right to call any witnesses designated or called to testify by any other party.

EXHIBITS

The Wind-Down Debtors designate the following exhibits that may be used at the Hearing (exclusive of those that may be used for impeachment purposes):

³ Capitalized terms used but not defined herein shall have the meaning assigned to them in the Motion.

Exhibit Number	DESCRIPTION	J U D I C I A L N O T I C E	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disp. After Trial
1.	Status Conference Statement of Defendants BlockFi Lending LLC and BlockFi Inc. for Case Nos. 20BBCV00308 and 20STCV31493 dated July 18, 2024 (<i>Exhibit B-1 to the Show Cause Motion</i>)							
2.	Status Report of Plaintiff George J. Gerro dated July 24, 2024 (<i>Exhibit B-2 to the Show Cause Motion</i>)							
3.	Defendants' Conference Dismissal Correspondence dated July 15, 2024 (<i>Exhibit C to the Show Cause Motion</i>)							
4.	Defendants' Dismissal Demand regarding California Litigation dated August 8, 2024 (<i>Exhibit D to the Show Cause Motion</i>)							
5.	Plaintiff's Request for Dismissal for Case No. 20BBCV00308 dated August 19, 2024 (<i>Exhibit E-1 to the Sow Cause Motion</i>)							
6.	Plaintiff's Request for Dismissal for Case No. 20STCV31493 dated August 19, 2024 (<i>Exhibit E-2 to the Show Cause Motion</i>)							
7.	Wind-Down Debtors' correspondence requesting dismissal with prejudice of California Actions dated September 6, 2024 (<i>Exhibit F to the Show Cause Motion</i>)							

Exhibit Number	DESCRIPTION	J U D I C I A L N O T I C E	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disp. After Trial
8.	George Gerro's Draft Stipulation to Dismiss Defendants BlockFi Lending, LLC; BlockFi, Inc.; [Proposed] Order Thereon for Case No. 20STCV31493 (<i>Exhibit G-1 to the Show Cause Motion</i>)							
9.	George Gerro's Draft Stipulation to Dismiss Defendants BlockFi Lending, LLC; BlockFi, Inc.; [Proposed] Order Thereon for Case No. 20BBCV00308 (<i>Exhibit G-2 to the Show Cause Motion</i>)							
10.	Defendants' Draft Stipulation and Agreed Order Regarding Prepetition Litigation and Third Circuit Appeal Filed by George J. Gerro (<i>Exhibit A to the Wind-Down Debtors' Reply in Support of the Motion for Entry of an Order to Show Cause Why George Gerro Should Not be Found in Contempt and for Sanctions and in the Alternative, Motion to Enforce the Confirmation Order (the "Reply")</i>)							
11.	Notice of Non-Voting Status With Respect to Disputed Claims dated August 3, 2023 (<i>Exhibit B to the Reply</i>)							
12.	Excerpt from Claims and Servicing Agent's Unredacted Service Exhibit (<i>Exhibit C to the Reply</i>)							
13.	Affidavit of Service of Solicitation Materials [Docket No. 1573]							

The Wind-Down Debtors ask that the Court take judicial notice of the pleadings and transcripts filed (including any and all schedules, amendments, exhibits, and other attachments thereto) in the proceedings before this Court. The Wind-Down Debtors reserve the right to use additional demonstrative exhibits as it deems appropriate in connection with the Hearing. The Wind-Down Debtors reserve the right to use any exhibits presented by any other party. The Wind-Down Debtors reserve the right to amend and/or supplement this exhibit list. The Wind-Down Debtors also reserve the right to use exhibits not listed herein for impeachment purposes at the Hearing.

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Dated: November 6, 2024

Respectfully Submitted,

/s/ *Daniel M. Stolz*

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